

effort to bring payments up-to-date.

9. Denied.

10. This para sates a conclusion of law to which no response is required.

WHEREFORE, Debtor demands a hearing.

FIRST DEFENSE
SUFFICIENT EQUITY

11. Debtor has sufficient equity, protect the interest of Midfirst Bank.

SECOND DEFENSE
Less Drastic Remedy

12. Even if the moving party is entitled to the Relief from the Stay, the Stay should not be terminated. The Court should rather grant less drastic Relief by conditioning or modifying the Stay.

13. WHEREFORE, the Debtor requests this Honorable Court to deny the Motion for Modification of the Stay and for such other Relief as the Court deems just and proper.

Respectfully Submitted,

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February 19, 2020

cc:

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